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ELECTRIC SOLIDUS, INC. d/b/a SWAN BITCOIN

IN THE UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

ELECTRIC SOLIDUS, INC. d/b/a SWAN BITCOIN, a Delaware corporation,

Plaintiff,

v.

PROTON MANAGEMENT LTD., a British Virgin Islands corporation; THOMAS PATRICK FURLONG; ILIOS CORP., a California corporation; MICHAEL ALEXANDER HOLMES; RAFAEL DIAS MONTELEONE; SANTHIRAN NAIDOO; ENRIQUE ROMUALDEZ; and LUCAS VASCONCELOS,

Defendants.

Case No. 2:24-cv-8280-WLH-E

DECLARATION OF ILISSA SAMPLIN IN SUPPORT OF PLAINTIFF'S RENEWED *EX PARTE* APPLICATION FOR EXPEDITED DISCOVERY ORDER

Judge: Hon. Wesley L. Hsu
Action Filed: September 25, 2024

I, ILISSA SAMPLIN, declare and state as follows:

1. I am an attorney admitted to practice law before this Court and the courts of this state. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP, and counsel of record for Plaintiff Electric Solidus, Inc. d/b/a Swan Bitcoin ("Swan") in the above-captioned case. I have personal knowledge of all the facts set forth in this declaration and, if called to testify, I could and would competently testify to them.

2. Attached as **Exhibit A** is a true and correct copy of Plaintiff's First Expedited Set of Interrogatories to Defendants Ilios Corp., Thomas Patrick Furlong, Michael Alexander Holmes, Rafael Dias Monteleone, Santhiran Naidoo, Enrique Romualdez, and Lucas Vasconcelos ("Individual Defendants"). My partner Christine Demana sent these First Expedited Set of Interrogatories to counsel for the Individual Defendants via email in the same form attached hereto (not including minor typographical corrections and reordering) on October 8, 2024.

3. Attached as **Exhibit B** is a true and correct copy of Plaintiff's First Expedited Requests for the Production of Documents to Individual Defendants. My partner Ms. Demana sent these First Expedited Requests to counsel for the Individual Defendants via email in the same form attached hereto (not including minor typographical corrections) on October 8, 2024.

4. Attached as **Exhibit C** is a true and correct copy of Plaintiff's First Expedited Set of Interrogatories to Defendant Proton Management Ltd. ("Proton"). My partner Ms. Demana sent these First Expedited Set of Interrogatories to counsel for Proton via email in the same form attached hereto (not including minor typographical corrections and reordering) on October 8, 2024.

5. Attached as **Exhibit D** is a true and correct copy of Plaintiff's First Expedited Requests for the Production of Documents to Defendant Proton. My partner Ms. Demana sent these First Expedited Requests to counsel for Proton via email in the same form attached hereto (not including minor typographical corrections) on October 8, 2024.

6. Attached as **Exhibit E** is a true and correct copy of emails between Swan's counsel and counsel for the Individual Defendants and counsel for Defendant Proton concerning the return of Swan's laptops, the last of which is dated October 9, 2024.

7. Attached as **Exhibit F** is a true and correct copy of emails between Swan's counsel and counsel for the Individual Defendants and counsel for Defendant Proton concerning Swan's expedited discovery requests that are the subject of Swan's Renewed *Ex Parte* Application for Expedited Discovery Order, the last of which is dated October 9, 2024.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 9th day of October 2024, in Los Angeles, California.

Dated: October 9, 2024 Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

By: */s/ Ilissa Samplin*

Ilissa Samplin

Attorneys for Plaintiff